

CB Security (UK) Ltd – Anti-Bribery and Corruption Policy (2025)

Policy Version: 2025

Date of Issue: 21 June 2025

Review Date: 20 June 2026

1. Policy Statement

CB Security (UK) Ltd adopts a zero-tolerance stance towards bribery and corruption. We are committed to conducting our business ethically, lawfully, and with integrity in accordance with the UK Bribery Act 2010, the Criminal Finances Act 2017, and international anti-corruption standards. This policy outlines the responsibilities of all personnel and third parties acting on our behalf in maintaining compliance and transparency in all our dealings.

2. Scope

This policy applies to all employees, officers, agency workers, subcontractors, consultants, suppliers, and anyone else acting on behalf of CB Security (UK) Ltd across all functions and locations.

3. Legal and Regulatory Framework

This policy is based on:

- The Bribery Act 2010
- The Criminal Finances Act 2017
- The Proceeds of Crime Act 2002
- UK Public Contracts Regulations 2015
- Ministry of Justice Guidance on Adequate Procedures
- ISO 37001:2016 Anti-Bribery Management Systems (guidance)

4. Definition of Bribery and Corruption

Bribery involves offering, giving, receiving, or soliciting anything of value to influence a decision or gain an unfair advantage. Corruption is the abuse of entrusted power for personal or organisational gain.

5. Prohibited Conduct

All CB Security stakeholders must not:

- Offer, promise, or give a bribe
- Request, agree to receive, or accept a bribe
- Use facilitation payments (unofficial payments to expedite actions)
- Offer or accept extravagant gifts, hospitality, or entertainment

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- Make political donations or charitable contributions as a cover for bribery

6. Gifts, Hospitality & Entertainment

- All gifts and hospitality must be modest, infrequent, and transparently recorded
- Hospitality must not be offered or accepted with the intention of influencing a decision
- Gifts valued above £50 must be declared to management and recorded in the Gifts Register
- Bribes disguised as gifts will be treated as gross misconduct

7. Third Party and Supply Chain Compliance

- All third parties acting on our behalf must comply with this policy
- Anti-bribery clauses are included in contracts with agents, subcontractors, and suppliers
- Due diligence is conducted before engagement
- Third-party payments must be auditable and approved

8. Responsibilities

- Board of Directors: Ensure policy oversight and risk management
- Managers: Promote anti-corruption culture and escalate concerns
- Employees and Contractors: Avoid and report all forms of bribery or suspicious conduct
- Compliance Lead/HR: Maintain training records and monitor compliance

9. Training and Awareness

- All staff must complete annual anti-bribery training
- New starters are briefed during induction
- Refresher training issued after regulatory updates

10. Reporting and Whistleblowing

- Any suspicions or concerns must be reported to the Compliance Officer or via the Whistleblowing Policy
- Reports will be treated confidentially and without retaliation

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- Anonymous reporting channels are available

11. Record Keeping and Controls

- Accurate records of all transactions, gifts, expenses, and approvals are maintained
- Regular internal audits and compliance checks are conducted
- Cash payments are discouraged and only used with written approval

12. Disciplinary Action and Sanctions

- Breach of this policy may lead to disciplinary action, including dismissal
- Serious breaches may be reported to law enforcement or regulatory bodies
- Any third-party contractor found in violation may have their contract terminated

13. Continuous Improvement

- This policy is reviewed annually or upon legislative change
- CB Security benchmarks practices against industry standards
- Lessons learned from breaches or audit findings are integrated into processes

14. Statement of Commitment

CB Security (UK) Ltd takes corruption and bribery seriously. Everyone working for and with us is expected to uphold the highest standards of integrity. This policy forms part of our ethical governance framework and must be adhered to without exception.

Approved by:

Cecil Bernard

Director, CB Security (UK) Ltd

Date: 23 June 2025